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November 3, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: MM Docket No. 92-192

Table of Allotments
FM Broadcast Stations
(Walton and Rochester, Indiana)

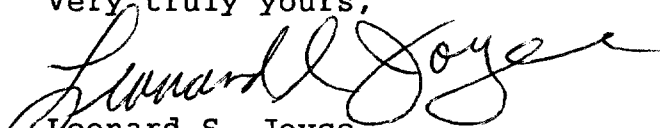
Reply Comments of Dowagiac
Broadcasting Company, Inc.

Dear Ms. Searcy:

Forwarded herewith on behalf of the Dowagiac Broadcasting Company, Inc. is its Reply Comments in the above reference proceeding.

Should there be any questions concerning this matter, please communicate directly with the undersigned.

Very truly yours,


Leonard S. Joyce

Enclosure

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

ORIGINAL

MM Docket No. 92-192

In the matter of)	
)	
Amendment of Section 73.202(b)))	RM-7960
Table of Allotments)	RM-8036
FM Broadcast Stations)	
(Walton and Rochester, Indiana))	

To: Michael Ruger
Chief - Allocations Branch

Reply Comments of Dowagiac Broadcasting Company Inc.

Dowagiac Broadcasting Company Inc. (DBC), by and through counsel, submits the following Reply Comments in the above-captioned proceeding.

1. DBC filed its Comments and Counterproposal, herein, October 19, 1992. Therein, DBC concluded that as between the communities of Walton and Rochester, Indiana, the public interest would be better served by assigning Channel 229A to Rochester.

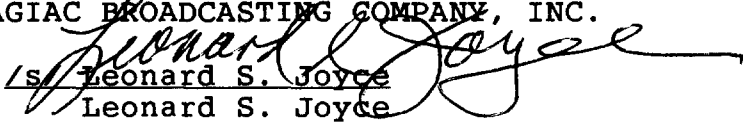
2. Comments were filed by Manitou Broadcasting Corporation/ Blair Communications Inc. (WROI(FM)) also supporting the assignment of Channel 229A to Rochester rather than Walton. DBC agrees with the reasoned arguments set forth by WROI(FM) in its Comments. Those Comments, coupled with the Comments advanced by DBC, in its Comments and Counterproposed, make it clear that the assignment of Channel 229A to Rochester must be adopted.

3. The only other Comments filed, herein, were by J.B. Ladd (Ladd) who supports the allotment of Channel 229A to Walton rather than Rochester, claiming that it will result in a first local service, which is to be preferred over the increase in service by Stations WROI and WDOW-FM. What Ladd fails to note, however, is that in addition to providing increased service to WROI and WDOW-FM, a grant of Channel 229A to Rochester will: (1) eliminate existing short spacing between WDOW-FM and WROI(FM); (2) eliminate short-spacing between WROI(FM) and WSVH(FM) Huntington IN; (3) eliminate short-spacing between WDOW-FM and WKGH(FM) at WDOW-FM's proposed 6 kilowatt site; and (4) permit WROI(FM) to serve portions of Fulton County that it does not now serve with needed service [See Comments of DBC and WROI(FM)]. Conversely, the only public interest consideration advanced by Ladd favoring assignment of 229A to Walton is that such would be a first local service. However, as WROI(FM) pointed out in its Comments, Walton has a very small population and is surrounded by the larger communities of Kohomo, Peru and Logansport, IN. which, combined have numerous AM/FM stations which serve Walton. Therefore, the need for a first local service to Walton is far less than normally would be the case. Thus, balancing the public interest considerations involved, allotment of Channel 229A to Rochester is to be preferred.

4. Of course, neither Ladd nor WROI(FM) commented upon the DBC counterproposal to substitute Channel 293A for Channel 221A at Rochester in the event the Commission declines to

substitute Channel 229A at Rochester, for, at the time they were unaware of this counterproposal. Possible, either or both will address this counterproposal in their Reply. Whether they, or either of them, support or oppose such a counterproposal, DBC desires to make clear, in this Reply, that DBC continues to advance such a counterproposal, if, and only if, Channel 229A is not assigned to Rochester. Further, if Channel 293A is assigned to Rochester, DBC will reimburse WROI(FM) its reasonable and prudent expenses involved in the frequency change, whether or not WROI(FM) supports or opposes such a frequency change.

Respectfully Submitted,
DOWAGIAC BROADCASTING COMPANY, INC.

By:  Leonard S. Joyce
Leonard S. Joyce

Its Attorney

Blair, Joyce & Silva
1825 K Street, N.W.
Washington, D.C. 20006

November 3, 1992

CERTIFICATE OF SERVICE

I, Snowdeen Dove, a secretary in the law firm of Blair, Joyce & Silva, do hereby certify that the foregoing REPLY COMMENTS was served this 3rd day of November, 1992, by mailing true copies thereof, postage prepaid, to the following persons at the addresses listed below:

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/s/ Snowdeen Dove